



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
AIR, WASTE AND  
TOXICS

MAY 17 2013

WA 3019

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5/14/13

FILE COPY

Ms. RueAnn Thomas  
Environmental Programs Director  
J.H. Baxter & Co.  
85 N. Baxter Road  
P.O. Box 10797  
Eugene, OR 97440-2797

Re: Preliminary Comment on Corrective Measures Study and Request for Work Plan for Pilot Study of Chemical Oxidation Feasibility  
Former J.H. Baxter & Co. ("Baxter"), Arlington Facility ("Facility")  
§ 7003 Administrative Order on Consent ("Order")  
Docket No.: RCRA-10-2001-0086  
EPA ID No.: WAD 05382 3019

Dear Ms. Thomas:

The U.S. Environmental Protection Agency, Region 10 ("EPA") has reviewed Baxter's Corrective Measures Study (CMS) – Revision 3, dated April 2013, submitted as a requirement of the above-mentioned Order. This version of the CMS proposes chemical oxidation as a potential alternative for soil remediation at the Facility. Chemical oxidation has not been discussed in previous versions of the CMS and its effectiveness and feasibility at the Facility is unknown. If Baxter wishes to retain this alternative for consideration, Baxter must:

- Submit a work plan for a pilot study of chemical oxidation as a potential remedy at the Facility, including a schedule for its implementation, to EPA for review and approval within thirty (30) days of receipt of this letter.

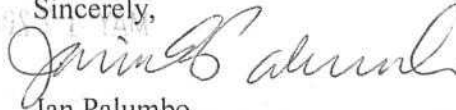
or

- Provide references to published reports that support the efficacy of chemical oxidation for the matrices and contaminants at the Facility.

Please note that, as with any new alternative, EPA is not in any way endorsing chemical oxidation as part of the remedy for the Facility. Results of the pilot study must be provided and evaluated before EPA will consider this alternative.

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Please contact me at (206) 553-6702 or at [palumbo.jan@epa.gov](mailto:palumbo.jan@epa.gov), or have your legal counsel contact Jennifer MacDonald at (206) 553-8311, if you have any questions.

Sincerely,



Jan Palumbo  
Project Coordinator

cc:

James C Hanken, Wolfstone, Panchot & Bloch  
Douglas Fox, Stella-Jones Corp.  
J. Stephen Barnett, Premier Environmental, Portland  
Gary Dupuy, Geomatrix, Seattle  
Georgia Baxter, J.H. Baxter, San Mateo  
Dean Yasuda, Washington State Department of Ecology

## Region 10 Routing and Concurrence

Author:	Jan Palumbo	Date:	5/14/13
Addressee:	RueAnn Thomas		
Subject:	Preliminary Comment on CMS – Revision 3		
File Location/Name:			

### PROGRAM ADMIN REVIEW:

Name:	WEISS	PALUMBO	ORC	OEA	POLICY FILE YES/NO	RCRAINFO YES/NO
Initials/Date:		5/15/13	5/16/13			

### PROGRAM OFFICE CONCURRENCE:

Name:	ARRIGONI	CASTRILLI	FISHER	HEDEEN	BROWN	MEYER
Initials/Date:	5/15/13	5/15/13				

### RA OFFICE CONCURRENCE/SIGNATURE:

Name:						
Initials/Date:						

**cc(s)** (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

James C Hanken Wolfstone, Panchot & Bloch 1111 Third Ave Bldg., Suite 1800 1111 Third Ave. Seattle WA 98101	Douglas Fox, Stella-Jones Corp.	J. Stephen Barnett, AMEC
Gary Dupuy, AMEC	Georgia Baxter J.H. Baxter	Dean Yasuda, Washington State Dept of Ecology

**bcc(s)** (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

	<b>J. Palumbo (AWT-121)</b>	
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Mailing Deadline:	May 17, 2013	Certified Mail:	original only
FAX to:		FAX #:	
ADDITIONAL INFO/INSTRUCTIONS:			
Filing Instructions:	WAD 05382 3019 FF 10C		
Program		Chrono.	Other